7 POTS business, is?

- 8 A. I believe our head count is right around 200.
- 9 Q. And during the period of time that the LISC has
- 10 been operating, what have been the hours of operation?
- 11 A. I am not sure I understand.
- 12 MR. KOLTO-WININGER: The regular business hours
- 13 or time the people are actually entering orders?
- MR. McDONALD: Q. What time are people there
- 15 regularly working at the LISC, from the time they commence
- 16 operations? Is it a seven-days-a-week, 24-hour day
- 17 operation; is it a five-day-a-week, 40-hour operation?.
- 18 A. Seven days a week.
- 19 Q. Has that been true since December of 1995?
- 20 A. No. We went to seven days a week around the
- 21 first of October of 1996.
- 22 Q. It's not a 24-hour-a-day operation, though?
- 23 A. No.
- 24 Q. Do you know generally what the hours of
- 25 operation have been, seven days a week? 0059
- 1 A. 7:00 a.m. to 11:00 p.m., with modified hours on
- 2 the weekends.
- 3 Q. Modified, meaning shorter on the weekend?
- 4 A. Yes.
- 5 Q. Is it a full day on the weekend or half day?
- 6 A. Full day.
- 7 Q. So is that 8 to 5, 8 to 4, or something like
- 8 that?

- 9 A. Normally, 7 until 6 or 7 at night, on average.
- 10 Q. During those hours, that's when orders are
- 11 processed; is that right?
- 12 A. Yes.
- 13 Q. In terms of responding to customer inquiries and
- 14 interacting with the CLC requests, what are the hours for
- 15 that function?
- 16 A. Monday through Friday, 8:00 a.m. to 5:00 p.m.
- 17 Q. Now, if there is an issue that CLC believes
- 18 needs to be addressed and it occurs after 5:00 p.m. on a
- 19 weekday or on a weekend, is there an avenue of interaction
- 20 where the CLC can communicate with the LISC?
- 21 A. Yes, there is an avenue.
- 22 Q. What is that?
- 23 A. Through the expedite escalation process. Excuse
- 24 me, I'm sorry. The avenue would be through the
- 25 maintenance group in Pasadena. 0060
- 1 Q. But if the issue was trying to locate an order
- 2 that had not yet been processed, would the maintenance
- 3 group be able to respond to an inquiry like that?
- 4 A. They would normally respond by advising the CLC
- 5 to call back within normal business hours to the LISC.
- 6 Q. Is the maintenance group called the ISC?
- 7 A. Yes, it is.
- 8 THE WITNESS: Can we take a two-minute health
- 9 break?
- 10 MR. McDONALD: Sure.

- 11 (Recess taken.)
- 12 MR. McDONALD: Q. In your position at the LISC,
- 13 you are familiar with the processes that are used by the
- 14 employees to process an order that comes from the CLC, so
- 15 that a resale end user is migrated; is that right?
- 16 A. Yes.
- 17 Q. What I'd like to do is walk you through what
- 18 that process is, and I will give you -- try to give you a
- 19 hypothetical, and you can tell me if this is a
- 20 hypothetical you can work with.
- 21 Assume that it's a business customer, okay,
- 22 three locations, okay?
- 23 A. Uhm-hum.
- 24 Q. 10 lines, two hunt groups -
- MR. KOLTO-WININGER: I am just going to write 0061
- 1 this down so she can see it.
- MR. McDONALD: Sure, that's fine.
- 3 MR. KOLTO-WININGER: You can even verify my
- 4 notes.
- 5 MR. McDONALD: I wouldn't want to look at your
- 6 attorney work product.
- 7 Q. Call forwarding, three Yellow Pages listings and
- 8 three White Pages listings. You've digested those
- 9 characteristics for a customer? Is that a realistic
- 10 hypothetical customer?
- 11 A. Yes.
- 12 Q. In your experience, both at the LISC and

- 15 Let's talk about -- what systems do you use to
- 16 process an order such as this?
- 17 A. To process an order in general, what systems?
- 18 Q. Right. If you if this order was submitted to
- 19 the LISC, to migrate, what systems does Pacific Bell use
- 20 to accomplish that migration order?
- 21 A. Probably a hundred different systems.
- 22 Q. And do you know what they are?
- 23 MR. KOLTO-WININGER: Do you know what they are?
- 24 THE WITNESS: Not all of them, no.
- 25 MR. McDONALD: Q. What are the principal ones? 0063
- 1 A. SORD, BOSS, LMOS.
- 2 Q. Can you spell that last one?
- 3 A. L-M-O-S.
- 4 That's a very difficult question to answer. In
- 5 general, there are lots and lots and lots of systems that
- 6 the order goes through.
- 7 MR. KOLTO-WININGER: Off the record for a
- 8 second.
- 9 MR. McDONALD: Uhm-hum.
- 10 (Discussion off the record.)
- 11 MR. McDONALD: Back on the record.
- 12 Q. So we are talking about this hypothetical end
- 13 user who's asked to be migrated to a CLC through NDM, the
- 14 LISC has received an order to migrate that hypothetical
- 15 customer, and you have testified that, essentially, a
- 16 sheet of paper will appear at the LISC; is that right?



- 17 A. Yes.
- 18 Q. How does that sheet of paper appear, what causes
- 19 that to appear?
- 20 A. When a CLC transmits an order to the LISC, the
- 21 order comes to the LISC via NDM, and there are two options
- 22 for that order to come in. It comes in on line and
- 23 through CLEO, through the Cesar system, or it will come in
- 24 via paper, printed out on the NDM.
- Once we receive the order, we take the order to 0064
- 1 the command center, which is the hub of the LISC, track
- 2 the order into our tracking system, so the order is
- 3 logged.
- 4 Q. Okay. I'm sorry to interrupt but maybe we can
- 5 take it in steps.
- 6 You said that when something comes in NDM, it is
- 7 one or the other, it's either printed or it's online?
- 8 A. It comes in online and it also downloads to a
- 9 print.
- 10 Q. All NDM orders are both online and paper?
- 11 A. Yes.
- 12 Q. And then Pacific's someone at the LISC takes
- 13 the paper and takes it to the control hub; is that what
- 14 you called it?
- 15 A. Command center.
- 16 Q. And is anything done with the online
- 17 information?
- 18 A. Not at that point.

- 19 Q. So the paper is taken to the command center
- 20 where it is essentially locked in. Is that how a tracking
- 21 system is created?
- 22 A. Yes.
- 23 Q. Do you assign a number to the order? How does
- 24 it track?
- 25 A. We track it by a PON number from the CLC. 0065
- 1 Q. That's Purchase Order Number?
- 2 A. Yes.
- 3 Q. Each CLC assigns a PON to his order, and then
- 4 that's the number that Pacific assigns to it to keep track
- 5 of it?
- 6 A. Yes, we track the incoming PON and the
- 7 incoming what is referred to as BTN, which is Billed
- 8 Telephone Number. In this case, because it's a business,
- 9 there would be one BTN with several lines underneath, and
- 10 we track by the BTN, which is the main number.
- 11 Q. In some instances you track by PON, and in other
- 12 instances you track by BTN?
- 13 A. It depends upon who we are talking to about the
- 14 order. If we are talking to the CLC, we talk in PON
- 15 terminology; if we are talking internally, we can talk in
- 16 terms of a PON or a BTN.
- 17 Q. Do you know why a PON was chosen for a method of
- 18 tracking when dealing with CLCs?
- 19 A. It was chosen by the CLCs.
- 20 Q. The PON is the PON number assigned by the CLC?

- 23 A. Yes.
- 24 Q. Is that the sole function that those six or

25 seven people perform?

- 1 A. Yes.
- Q. What system do they use to -- what system is
- 3 used to track the PON or the BTN?
- 4 A. The LISC Tracking Database.
- 5 Q. Is that referred to as LTD?
- 6 A. Yes.
- 7 Q. Who has access to that?
- 8 A. LISC personnel.
- 9 Q. That's not available to CLCs?
- 10 A. No.
- 11 Q. What information is available on the LTD?
- 12 A. The PON number, the telephone number -
- 13 Q. is that the BTN, I'm sorry?
- 14 A. Yes, sorry, BTN, date received, time received.
- 15 And there are response indicators that we complete when we
- 16 respond back to a CLC, with either a FOC, which is a Firm
- 17 Order Confirmation, or a completion information.
- 18 Q. Now, the date and time received, is that the
- 19 date and time of the order that the paper printed out at
- 20 the LISC, or is that the time that the person working the
- 21 command center enters this information into the LTD?
- 22 A. The date and the time is on the header on the
- 23 NDM order. The system will stamp it as to when it was
- 24 received in the LISC.

- 25 Q. So does that correspond to the time that the 0068
- 1 paper appeared at the LISC?
- 2 A. Yes.
- 3 Q. So hypothetically, if this order came in, it was
- 4 printed up at the LISC, 2:00 o'clock in the afternoon, and
- 5 someone retrieved it and it was entered into the LTD at
- 6 5:00 o'clock that afternoon, the time that it would go in,
- 7 the time of the day would be the 2:00 o'clock in the
- 8 afternoon time?
- 9 A. Yes.
- 10 Q. Is there any established interval for the amount
- 11 of time that Pacific takes to enter into the LTD an order
- 12 that's received via NDM?
- 13 A. Not to my knowledge.
- 14 Q. Do you know what the range of intervals has
- 15 been?
- 16 A. No, I don't.
- 17 Q. Has it been more than -- more than a week?
- 18 A. I don't know what the range is.
- 19 Q. You don't know if there have been orders that
- 20 came in, and they were not entered into LTD for more than
- 21 a week after they were received?
- 22 A. I don't have that information.
- 23 Q. Is there anybody who would have that
- 24 information?
- 25 A. I don't know who would have it. 0069
- 1 Q. To your knowledge, are there any records

- 2 maintained at the LISC, or elsewhere, that show the
- 3 interval between the time that the order is printed out at
- 4 the LISC and the entry is made in the LTD tracking
- 5 database?
- 6 A. Not to my knowledge.
- 7 Q. Do you know if there are any standards that
- 8 Pacific has established for what that interval should be?
- 9 A. Not to my knowledge.
- 10 Q. Do you have an expectation as to how long that
- 11 interval should be?
- 12 A., Do I personally?
- 13 Q. Yeah.
- 14 A. No, I don't.
- 15 Q. Are you indifferent as to whether it's an hour
- 16 or six weeks?
- 17 A. Can you clarify indifferent?
- 18 Q. Well, in your view, should it take an hour or
- 19 six weeks to have this -- an order entered in the LTD?
- 20 A. I guess I don't have an opinion.
- 21 Q. You don't have an expectation as to how long it
- 22 should take for the order to be entered into the LTD?
- 23 A. No, I don't have an expectation.
- 24 Q. And no one within Pacific Bell has expressed to
- 25 you any view as to the amount of time it should take to
- 1 have the orders entered into the LTD?
- 2 A. No.
- 3 Q. Are you aware of orders that have not been

- 4 entered into the LTD for periods of a week or more?
- 5 A. No, I am not aware of that.
- 6 Q. To your knowledge, all orders that have been
- 7 received via NDM were entered into the LDT within less
- 8 than a week?
- 9 A. I don't have any knowledge of that.
- 10 Q. You have not heard of any delays resulting from
- 11 a backlog existing, such that orders were not entered into
- 12 the LTD within less than a week?
- 13 A. I have not heard that.
- 14 Q. So then, after the person at the command center
- 15 enters in information about the order into the LTD, what
- 16 happens next with the order? Again, we will work with
- 17 this hypothetical order.
- 18 A. Then a package would be built for that
- 19 particular end user account. And in that package, we
- 20 would include the order that came in via NDM. And then
- 21 the order would be sent out to the LISC for processing and
- 22 logged in LTD, and to who the order was sent to for
- 23 processing and the date and time that it was sent.
- 24 Q. Does that complete the -- at least the initial
- 25 handling by the key person at the command center of the 0071
- 1 order?
- 2 A. Yes.
- 3 Q. When you say there is a package built, is that a
- 4 physical file or something that's created?
- 5 A. Yes.

- 8 into that envelope, and that's how the order stays
- 9 together.
- 10 Q. Does the order have any the envelope, sorry,
- 11 have a marking based upon PON number, something like that,
- 12 that you can view from the exterior?
- 13 A. Yes.
- 14 Q. When it's sent out for processing, is there sort
- 15 of a processing sheet or something that's printed out that
- 16 identifies who -- what individual that's been directed to,
- 17 or the date and time that it was that the order was being
- 18 directed out of the command center?
- 19 A. Is there a processing sheet?
- 20 Q. Is there something, something written in the
- 21 package so that it says -- comes out of the command
- 22 center, directed to a single individual?
- 23 A. Yes.
- 24 Q. So does it say, this is to be directed to, you
- 25 know, Sally Smith, and at this time and date? 0073
- 1 A. Yes.
- 2 Q. Where does that appear?
- 3 A. On the front of the package.
- 4 Q. So it's printed -- is that printed right on the
- 5 envelope then?
- 6 A. Yes.
- 7 Q. So that the time and date that's shown for
- 8 the -- for that sending it out of the command center,
- 9 could be compared with the time and date received, to

- 10 determine what the interval was between the time and the
- 11 receipt of the order and the time that it was sent out for
- 12 processing, right?
- 13 A. Yes.
- 14 Q. Do you know if Pacific has ever examined that
- 15 interval?
- 16 A. Yes.
- 17 Q. And do you know who did that?
- 18 A. No, I don't.
- 19 Q. How do you know it was done?
- 20 A. I vaguely remember hearing conversation about
- 21 it, but I don't recall with who.
- 22 Q. Do you remember what the conversation was about?
- 23 A. It was around LTD, but no, I don't remember.
- 24 Q. Was there an issue of excessive amount of time,
- 25 an excessive interval for the LTD process to be performed? 0074
- 1 A. I really don't recall.
- 2 Q. So at this point, the information has come in
- 3 through NDM, a hard copy of the order was provided to
- 4 someone at the command center who made some key logging
- 5 entries into the LTD; is that right?
- 6 A. Yes.
- 7 Q. And then took the order copy information that
- 8 came via NDM and inserted it in an envelope that's a
- 9 package for it to be then forwarded on to someone else at
- 10 the LISC to process; is that right?
- 11 A. Yes.

- 14 A. The command center would make that
- 15 determination; either title can get the order.
- 16 Q. So the fact that this is a particular type of
- 17 hypothetical customer doesn't dictate that it necessarily
- 18 would go to, say, a service representative to the
- 19 exclusion of an order writer?
- 20 A. No.
- 21 Q. How do you distinguish between an order writer
- 22 and a service representative? Are there different
- 23 requirements in terms of skills, training, experience?
- 24 A. The only real distinction would be that a
- 25 service representative can accept incoming calls from a 0076
- 1 customer, and an order writer cannot, so it's a union
- 2 issue.
- 3 Q. As far as, you know, the terms of the the
- 4 skills that the individual brings to the tasks or the
- 5 requirements as to the experience either of them has, to
- 6 your knowledge, it's not different?
- 7 A. Correct.
- 8 Q. When an order is sent out specifying the
- 9 individual who is to receive it, is it possible that
- 10 individual will already have four or five or more orders
- 11 that he or she is currently working on?
- 12 A. Yes, that's a possibility.
- 13 Q. Is there any system in place to attempt to
- 14 allocate the work in light of the existing work that's
- 15 already been allocated?

- 16 A. Is there a system in place now that will
- 17 allocate the work?
- 18 Q. Yes.
- 19 A. No, there is no system in place.
- 20 Q. Let me try to figure out understand how this
- 21 works.
- 22 You have got the tracking -- is it the tracking
- 23 database itself that identifies the individual whose name
- 24 will appear on the envelope?
- 25 A. No.

- Q. How is that determined?
- 2 A. By the command center.
- 3 Q. So an individual makes a selection?
- 4 A. Yes.
- 5 Q. And you say you had maybe six or seven people
- 6 working in the command center?
- 7 A. Yes.
- 8 Q. And they will have a list of the individuals who
- 9 are currently available to handle an order at a given time
- 10 of a given day?
- 11 A. Yes.
- 12 Q. How do they select, of that universe of
- 13 potential recipients of the order, who is to receive any
- 14 particular order?
- 15 A. From the list they have in front of them, that
- 16 has the names of the people that are there for that day.
- 17 Q. But is a person in the command center told to

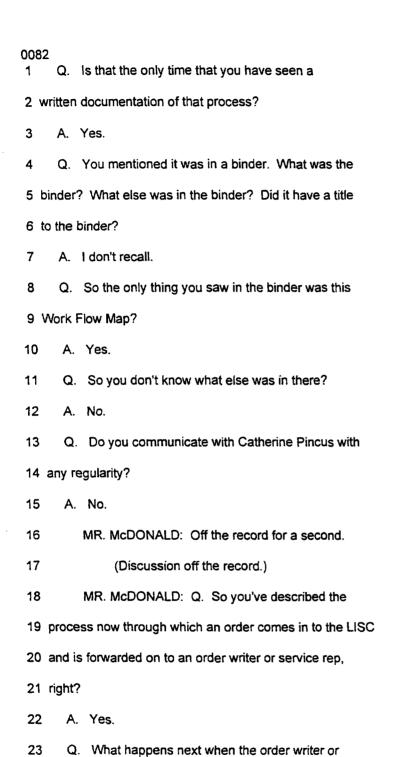
- 18 run through the list sequentially so your first order is
- 19 the person that's first on the list, and the second order
- 20 is the person that's second on the list?
- 21 A. I don't know how individually they are assigned
- 22 that.
- 23 Q. But to your knowledge, there is no effort to
- 24 identify any particular -- either the service rep or order
- 25 writer has in terms of existing work to determine who has 0078
- 1 additional capacity to take the next order?
- 2 A. That's negotiated between the manager and the
- 3 service representative or order writer that directly
- 4 reports to that manager.
- 5 Q. Where does the manager come into play, where the
- 6 command center is making the assignment?
- 7 A. There's communication between the command center
- 8 and the manager, who has the group of individuals to type
- 9 the orders, as to how many people are in that group for
- 10 that day and how much work each individual can take.
- 11 Q. So then the manager is supposed to communicate
- 12 with the command center to identify which individuals are
- 13 available and have capacity to take on additional orders?
- 14 A. Yes.
- 15 Q. And then, based on that information, the person
- 16 at the command center makes the assignment out?
- 17 A. Yes.
- 18 Q. Is there any existing system to track the number
- 19 of outstanding orders?

- 20 MR. KOLTO-WININGER: Go ahead. I just want to
- 21 make sure you two speak the same language when you say
- 22 systems. She may interpret it to mean a system which may
- 23 not -- as opposed to procedure.
- 24 MR. McDONALD: Q. Okay. Let's step back.
- 25 I have heard an acronym, M&P, commonly used, 0079
- 1 Methods and Procedures?
- 2 A. Uhm-hum.
- 3 Q. That's something that means something to you?
- 4 A. Yes.
- 5 Q. Is there an M&P for the LISC?
- 6 A. Yes.
- 7 Q. And what does that -- what's contained in that?
- 8 A. Information that's relative to processing
- 9 service orders for both the service representative and the
- 10 order writer.
- 11 Q. And is that a document, the M&P, for the LISC?
- 12 A. Yes.
- 13 Q. Is that something that's changed over time?
- 14 A. Yes.
- 15 Q. Does the LISC M&P describe the process that we
- 16 discussed thus far, in terms of the order coming in via
- 17 NDM and going to the command center for entering to LTD?
- 18 A. No.
- 19 Q. What does -- what does it address?
- 20 A. What is it?
- 21 Q. The M&P.

24	A.	In the LISC.
25 0081	Q.	Does that document have a name other than work
1 flow map?		
2	A.	Not that I recall.
3	Q.	Do you currently have a copy of that?
4	A.	No, I don't.
5	Q.	Do you know who does?
6	A.	Yes.
7	Q.	Who does?
8	A.	Catherine Pincus.
9	Q.	Who is she?
10	A.	A Pacific Bell employee.
11	Q.	What's her title?
12	A.	I don't know what her title is.
13	Q.	Does she work in the LISC?
14	A.	No.
15	Q	. Did you give her your copy of this document?
16	A.	No.
17	Q	. How did she come to receive it?
18	Α	. I don't know.
19	Q	. What were the circumstances under which you saw
20 it?		
21	Α	From what I recall, I was in a meeting.
22	Q	With whom, regarding what?
22	٨	I don't recall with whom, and I don't recall

24 what it was about. I just vaguely remember seeing the

25 mapped out job process of what I described.



24 service rep receives the order? And again, we are working

25 with this hypothetical customer.

A. The order is typed.

Q. And typed into what, a database?

0083

bell out how these hunt groups are involved in these

- 6 different addresses, and all of the features and all of
- 7 that information would be typed into the SORD order.
- 8 Q. And because there are three different addresses,
- 9 there would be three different SORD orders created?
- 10 A. Correct. And three separate NDM orders from a
- 11 CLC because the CLC cannot combine addresses on an NDM
- 12 order, nor can they combine it on a fax order.
- So in this case, provided we received three NDM
- 14 orders and provided the information was correct on those
- 15 three orders, if the service representative was able to
- 16 type into SORD the information that came over, then the
- 17 service representative would do that, and like I said,
- 18 ue the FOC. If not, they would enter a rejection into
- 19 the system and reject the order back to the CLC, and they
- 20 would then, in turn, update LTD to that effect.
- 21 Q. Let's go back to the very beginning. So
- 22 assuming that the CLC has sent three orders via NDM
- 23 because of the three different locations, when Pacific
- 24 receives those three orders, what does it do with them?
- 25 Are they grouped together? 0085
- 1 A. No.
- 2 Q. So it's possible that each of the three could be
- 3 sent to three different individuals at the command center?
- 4 A. It's possible.
- 5 Q. And then, when the order is entered in the LTD,
- 6 & then forwarded on to an order writer or a service rep,

- 9 working with, this could come in on three different PONs,
- 10 it could be entered by three different people in the
- 11 command center, and then be shipped out to be of the
- 12 orders processed by three different service
- 13 representatives or order writers?
- 14 A. Uhm-hum.
- 15 Q. Now, when the service rep or order writer
- 16 receives that package, you said that they type the
- 17 information in SORD, right?
- 18 A. Uhm-hum.
- 19 Q. And that address and and there is additional
- 20 information that goes in the SORD, besides the address?
- 21 A. Yes. The lines would go into SORD, and then the
- 22 features that relate to each of those lines. In other
- 23 words, whatever is put on the order as -- whatever is
- 24 received from the CLC is what we input into SORD.
- Q. And then you said the service rep would update 0087
- 1 the LTD, but you mentioned a FOC. What does a service rep
- 2 do that generates a FOC?
- 3 A. They type the order into SORD, and then after
- 4 they've typed it into SORD, at that point, they FOC back
- 5 to the CLC. And they would FOC the order number off of
- 6 the SORD order and the due date back to the CLC.
- 7 Q. How does that appear on the screen? Is there a
- 8 single screen template for the SORD entry initially or are
- 9 there multiple screens?
- 10 A. There can be multiple screens, depending upon

- 11 the complexity of the order, and that's SORD.
- 12 Q. Right. Assuming these characteristics of the
- 13 migrated end user, how many screens would this generate?
- 14 A. Again, because these are three separate orders,
- 15 probably one or two screens per order.
- 16 Q. And then, once those screens are completed,
- 17 assuming there haven't been orders, does something next
- 18 appear on the order writer's screen, or do they switch
- 19 systems? What happens next?
- 20 A. They switch systems. They go to Cesar, CLEO and
- 21 they FOC at that point, provided or this is the NDM
- 22 order, so they would go into Cesar, CLEO and then enter
- 23 the FOC through Cesar, CLEO.
- 24 Q. Does that happen immediately upon concluding the
- 25 entries into SORD?

- 1 A. Yes, it does.
- 2 Q. So there is not a system of entering a number of
- 3 orders into SORD and then switching systems, getting into
- 4 CLEO and then doing the FOC's every hour, or something
- 5 like that?
- 6 A. No.
- 7 Q. What's required to switch systems to go from
- 8 SORD into CLEO?
- 9 A. Just a key stroke on the keyboard.
- 10 Q. What appears when they switch from SORD to CLEO,
- 11 do they get a new template?
- 12 A. Well, they are actually now into a different

- 13 system that they already logged onto earlier in the day,
- 14 so it's just a matter of quick switching into that system
- 15 and then putting in a certain command to get to the right
- 16 screen to be able to FOC.
- 17 Q. The information that the order writer or service
- 18 rep keyed in for a SORD database, does any of that
- 19 transfer into the CLEO system, or are there new key
- 20 strokes that have to be struck in order to reference the
- 21 order number and the like?
- 22 A. I know for sure that the order number from the
- 23 order from SORD has to be keyed in and the due date needs
- 24 to be keyed in, as well as the PON. And there's some
- 25 other information at the top of the FOC that also needs to 0089
- 1 be keyed in, and I forget exactly what it is, but it
- 2 pertains specifically to the CLC.
- 3 Q. Where does the due date come into this?
- 4 A. The due date comes from SORD.
- 5 Q. So maybe we can go back into the SORD entry
- 6 exercise.
- 7 The service representative enters data into
- 8 SORD, based on the package that he or she got from the
- 9 command center. And after entering that information,
- 10 something occurs that causes the service rep, then, to see
- 11 a due date appear; is that how it happens?
- 12 A. No. The service representative inputs the
- 13 appropriate due date into SORD.
- 14 Q. And how does the service rep know what the date

- 15 is?
- 16 A. That depends on what type of SORD is being
- 17 placed.
- 18 Q. What are the range of orders that will dictate
- 19 the range of due dates?
- 20 A. A migration order has set due date intervals, as
- 21 opposed to any other type of an order.
- 22 Q. What are the set due dates for migration orders?
- 23 A. Three days.
- 24 Q. Do you know who set that?
- 25 A. Specifically, no, I don't.
- 1 Q. Is that three calendar days, three business
- 2 days?
- 3 A. Three business days.
- 4 Q. That's three days from what?
- 5 A. From date of receipt.
- 6 Q. Date of receipt of what?
- A. Of the order.
- 8 Q. Well, is that from the date received shown on
- 9 the LTD? Is that the date of the order?
- 10 A. Yes.
- 11 Q. So if on Monday an order comes in the order
- 12 comes in and it's received by Pacific, that means the due
- 13 date is that Thursday?
- 14 A. Yes.
- 15 MR. CHANG: Could I just ask, the date received
- 16 is the date stamped by the NDM printout, the automatic

- 17 date-stamp from the NDM printout?
- 18 THE WITNESS: Yes.
- 19 MR. CHANG: Okay.
- 20 THE WITNESS: That's provided the order is
- 21 received before 3:00 in the afternoon. Because after 3:00
- 22 in the afternoon, then we consider it received the
- 23 following day.
- 24 MR. McDONALD: Q. So if this order were
- 25 received Monday at 1:00 p.m., the due date for 0091
- 1 accomplishment of the migration would be Thursday?
- 2 A. Yes.
- 3 Q. Have there been instances where the service rep
- 4 or the order writer did not receive the order until after
- 5 the three days passed?
- 6 A. No, not to my knowledge.
- 7 Q. So it's your testimony that every order that's
- 8 come in via NDM, that has had a date and time established,
- 9 has been processed with a migration due date that's three
- 10 days from the date it was received?
- 11 A. To the best of my recollection.
- 12 Q. Is there any other information that is
- 13 established by the service strike that.
- 14 What else does a service representative enter?
- 15 You told us about the address lines, features, the due
- 16 date, what else do they enter into the SORD?
- 17 A. They would enter the taken date.
- 18 Q. What is that?

- 19 A. The date that the order was received, the
- 20 received date. And as far as order processing is
- 21 concerned, the taken date, that's the date that the order
- 22 was taken. So in your scenario, where the order was
- 23 received on Monday the 24th, then the taken date on that
- 24 order is Monday the 24th.
- 25 Q. So that day would be the same as what's on the 0092
- 1 LTD tracking database for the date received?
- 2 A. Yes. They type the taken date, the sales code
- 3 which is unique for each individual, they type the body of
- 4 the order where they type all of this in, and then special
- 5 remarks that might be needed, as the order is flowing
- 6 through the different departments, and the processing
- 7 groups, and I believe that's it.
- 8 Q. Okay. So when the service rep is finished with
- 9 the SORD, then he or she switches over to CLEO, and what
- 10 information do they put in at that point?
- 11 A. The Pac Bell service order number.
- 12 Q. Where do they get that number?
- 13 A. From SORD.
- 14 Q. Did that stay on the screen? How do they
- 15 transfer that number?
- 16 A. Manually.
- 17 Q. So does that mean they are required to write it
- 18 down and then type it in?
- 19 A. They can actually type it in individually or
- 20 they can copy the SORD order number and then place it on